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*Wood Partners, LLC, and Wood Real Estate*  
9 *Investors, LLC*

10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12 VANESSA NELSON

13 Plaintiff,

14 vs.

15 WOOD RESIDENTIAL, LLC; WOOD  
16 PARTNERS, LLC; WOOD REAL ESTATE  
17 INVESTORS, LLC; and DOES 1-50,  
inclusive,

18 Defendants.  
19

Case No. 2:24-cv-00419-ART-BNW

**STIPULATION TO EXTEND THE  
DEADLINE FOR DEFENDANTS TO  
RESPOND TO PLAINTIFF'S  
AMENDED COMPLAINT**

(Second Request)

20 IT IS HEREBY STIPULATED by and between the parties, through their respective counsel,  
21 to extend the current deadline, November 20, 2024, two weeks to December 4, 2024, for Defendants  
22 to file answers to Plaintiff's Amended Complaint.

23 1. On October 9, 2024, the Court held a hearing on Defendants' respective Motions to  
24 Dismiss. ECF No. 28 and 29. The Court ruled from the bench and denied Defendants' motions on  
October 9, 2024. A Minute Order followed on October 22, 2024. ECF No. 45.

25 2. On October 24, 2024, the Court granted the parties' stipulation and first request to  
26 extend Defendants deadline to file answers to the Amended Complaint to November 20, 2024. ECF  
27 No. 48.

28 3. The Amended Complaint includes twelve (12) claims and asserts collective claims

1 under the Fair Labor Standards Act and class action wage related claims under Nevada Revised  
 2 Statutes Chapter 608, spanning twenty-four (24) pages and 158 discrete paragraphs, plus  
 3 subparagraphs as to the class/collective claims, requiring substantive responses in answers coupled  
 4 with affirmative defenses.

5 4. Undersigned Defense Counsel has been unable to complete draft answers for all the  
 6 Defendants as Counsel became unexpectedly ill with the flu on November 5, 2025, and was out of  
 7 the office for over a week due to illness and was unable to work on the Answers during that time.

8 5. Given Defense Counsels' recent absence due to illness, and the time necessary to  
 9 prepare answers given the scope and breadth of the Amended Complaint, Defendants need  
 10 additional time to complete their answers. Further, next week is the Thanksgiving Holiday when  
 11 the parties and their counsels will be away with their families for the Holiday.

12 6. Thus, the parties hereby stipulate to extend the deadline to December 4, 2024, for  
 13 Defendants to file answers to the Amended Complaint.

14 7. This request is made in good faith and not for the purpose of delay. This is the  
 15 second request to extend the deadline for Defendants to file answers to the Amended Complaint.

16 Dated this 18th day of November, 2024.

17 RAFII & ASSOCIATES, P.C.

JACKSON LEWIS P.C.

18 /s/ Jason Kuller

18 /s/ Deverie J. Christensen

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## 22 **ORDER**

23 IT IS HEREBY ORDERED that the deadline for Defendants to file answers to Plaintiff's  
 24 Amended Complaint is continued to December 4, 2024.

25 Dated this 20 day of November, 2024.

26   
 27 United States District Court/Magistrate Judge  
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